



**OFFICE OF THE ATTORNEY GENERAL**  
**STATE OF ILLINOIS**

**Lisa Madigan**

ATTORNEY GENERAL

October 21, 2013

**Via E-Docket**

Elizabeth A. Rolando  
Chief Clerk  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

**Re: ICC Docket 13-0553 – Commonwealth Edison Company**

Dear Ms. Rolando:

Enclosed please find the Errata to AG exhibits 1.0 (Direct Testimony of Michael L. Brosch), AG Ex. 1.3, AG Ex. 1.4, AG Ex. 1.6, AG Ex. 1.7, and 1.9 (attachments to Mr. Brosch's Direct testimony); AG Ex. 2.0 (Direct Testimony of David J. Effron); and AG Ex. 2.2 (attachment to Direct testimony of David J. Effron). The changes are as follows:

**The Direct Testimony of Mr. Brosch, AG Ex. 1.0, is modified as follows:**

- The Table of Contents should be modified as follows:

III. RECONCILIATION DEFERRED TAXES..... 99

should read

III. RECONCILIATION DEFERRED TAXES..... 9

- The Exhibit Listing references to AG Exhibits 1.3, 1.4 and 1.7 should be modified as follows:
  - "AG Exhibit No. 1.3 AG Proposed Changes to ComEd Schedule FR A-3" is stricken in its entirety. For ease of citation, the subsequent exhibit numbers will remain as originally designated;
  - AG Exhibit No. 1.4 "AG Proposed Changes to ComEd Schedule FR D-1" is changed to "AG Exhibit No. 1.4 Corrected: AG Proposed Changes to ComEd Schedule FR D-1";

- AG Exhibit No. 1.7 “AG Schedule FR A-4, Docket No. 13-0318” is changed to “AG Exhibit No. 1.7 AG Proposed Changes to ComEd Schedule FR A-4 from Docket No. 13-0318”
- AG Exhibit No. 1.9 “ComEd WP-4, Docket No. 13-0318” is changed to “ComEd Ex. 3.02, page 26 (WP4) from Docket No. 13-0318”
- AG Ex. 1.0, page 3, the sentence starting at line 67 should read “AG Exhibit 1.4 Corrected sets forth the People’s proposed revisions to Schedule FR D-1 from Docket No. 13-0318 and Docket 13-0386 that are needed to eliminate ComEd’s inappropriate factoring up of the reconciliation interest rate applicable to the reconciliation balance on Schedule FR A-4 from Docket No. 13-0318 and Docket 13-0386.”
- AG Ex. 1.0, page 3, the sentence starting at line 70 should read “AG Exhibit 1.7 Corrected is a copy of the People’s proposed revisions to ComEd Schedule FR A-4 from Docket No. 13-0318 in order to properly offset reconciliation-related Accumulated Deferred Income Taxes (“ADIT”) prior to applying interest to the monthly reconciliation balance.”
- AG Ex. 1.0, page 6, the sentence starting at line 131 should read “A copy of ComEd Ex. Sch. FR A-1 from Docket No. 13-0318 is attached to this testimony for reference purposes as AG Exhibit 1.6.”
- AG Ex. 1.0, page 8, the sentence starting at line 160 should read “The AG-proposed changes to Schedule FR A-4 from ICC Docket No. 13-0318, applying the WACC interest rate at line 2, is attached as AG Ex. 1.7 Corrected.”
- AG Ex. 1.0, page 8, line 171 “calculated at Sch. FR D-1 and that appears” should read: “calculated at Sch. FR D-1 in Docket Nos. 13-0301 and that appears”
- AG Ex. 1.0, page 9, line 187 “ComEd Exhibit 3.18, Schedule FR D-1” should read “ComEd Exhibit 3.18, Schedule FR D-1 in Docket No. 13-0318.”
- AG Ex. 1.0, page 9, line 187-8 “AG Exhibit 1.3” should read “AG Exhibit 1.4 Corrected.”
- AG Ex. 1.0, page 16, line 349, “AG Exhibit 1.4” should read “AG Exhibit 1.7 Corrected.”
- AG Ex. 1.0, page 16, line 357, “Pre-Tax Weighted Average Costs of Capital” should read “Wtd Avg Cost of Capital (%)”.
- AG Ex. 1.0, page 16, line 358, “Total Revenue Effect of Return” should read “Total Revenue Effect of Return (%)”.

- AG Ex. 1.0, page 16, the sentence starting at line 365 should read “A new line 30a, captioned “Restore Deferred Income Taxes” is then inserted to remove the Deferred Income Taxes offset from line 1f, so as to provide for full recovery of the reconciliation balance with pretax revenues.”
- AG Ex. 1.0, page 17, line 369 deletes “(see AG Ex. 1.7)”
- AG Ex. 1.0, page 18, line 376, inserts “in Docket No. 13-0318”

**The attachments to Mr. Brosch’s testimony should be modified as follows:**

- AG Ex. 1.3 is stricken in its entirety. As noted above, for ease of citation, the subsequent exhibits will remain as originally designated.
- AG Ex. 1.4 is replaced by AG Ex. 1.4 Corrected. This exhibit has been provided in color for purposes of clarity. No other changes were made to this exhibit.
- AG Ex. 1.7 is replaced by AG Ex. 1.7 Corrected. This exhibit has been provided in color for purposes of clarity. No other changes were made to this exhibit.

**AG Ex. 2.0, the Direct Testimony of David J. Effron, should be modified as follows:**

- AG Ex. 2.0, page 7, line 152-153, “As can be seen on ICC Docket No. 13-0386, Schedule FR A-4, and in Docket No. 13-0318, Schedule FR A-4 attached to my testimony as AG Ex. 2.2,” should read “As can be seen on ICC Docket No. 13-0318, Schedule FR A-4, attached to my testimony as AG Ex. 2.2

**The attachments to Mr. Effron’s testimony should be modified as follows.**

- AG Ex. 2.2 is replaced by AG Ex. 2.2 Corrected. AG Ex. 2.2 inadvertently contained FR-A-1-REC from Docket No. 13-0318 when it should have contained ComEd Schedule FR A-4 from Docket No. 13-0318. This has been corrected in AG Ex. 2.2 Corrected.

Please note that clean and redlined versions of AG Exhibits 1.0 and 2.0 are being served on the parties to this docket. Also AG Exhibits 1.4 Corrected, 1.7 Corrected and 2.2 Corrected are also being served.

Sincerely,  
 By: \_\_\_\_\_/s/\_\_\_\_\_  
 Karen Lusson  
 Senior Assistant Attorney General  
 Public Utilities Bureau  
 Illinois Attorney General's Office  
 100 W. Randolph Street, 11<sup>th</sup> Floor  
 Chicago, Illinois 60601  
 312-814-1136  
[klusson@atg.state.il.us](mailto:klusson@atg.state.il.us)

cc: Service List (via e-mail)